

Exhibit XI

January 23, 2019

CERTIFIED MAIL:

AIG EUROPE LIMITED

The AIG Building
58 Fenchurch Street
London EC3M 4AB

This is not an attempt to collect a debt.
This letter is sent for informational
purposes only. We acknowledge your
bankruptcy filing.

RE: Insurance Policy No. PTNAM1701557, effective from 06/01/2017-06/01/2018
Insurance Policy No. PTNAM1802875, effective from 06/01/2018-06/01/2019

To Whom It May Concern:

Our firm represents Santa Rosa Mall, LLC ("Santa Rosa Mall"), a loss payee to the above referenced property insurance policies, which cover Sears Store No. 1915 ("Store 1915") located at Santa Rosa Mall, Bayamón, PR 00959. The purpose of this letter is to request information regarding the status of a claim under either policy, as set forth in our client's October 30th letter attached hereto as **Exhibit I**. This is not a collection letter or a demand for payment.

Store 1915 has remained closed since September 2017, due to damages suffered during Hurricane Maria. Pursuant to Michael Lodi, Property Analyst at Sears Holdings Corporation, "Sears has an insurance claim for this loss". At such time, Sears was insured by AIG Europe Limited ("AIG") under Policy No. PTNAM1701557. I am including a copy of the *Certificate of Property Insurance* as **Exhibit II**. Under the "Additional Remarks Schedule" of such *Certificate*, "Santa Rosa Mall LLC [] [is] included as Loss Payee in accordance with the policy provisions of the Property policy with respect to the property located at the above referenced location", referring to Store 1915. Id. Thus, upon information and belief, Sears is currently insured by AIG under Policy No. PTNAM1802875.

As a Loss Payee, Santa Rosa Mall affirming it has an interest in any negotiation conducted by and between AIG and Sears, as well as any proceeds thereto. As such, we provide notice, and hereby copy Debtor's counsel, that any insurance proceeds recovered for loss or damage be issued jointly to Debtor and Santa Rosa so that funds can be deposited in a segregated account to be used only for the repairs to Store 1915, in compliance with Section 6.03(b)(3) of the *Lease Agreement* executed by Santa Rosa Mall and Sears on September 22, 1965.

As it relates to AIG Europe Limited, this letter is being sent in conjunction with the Debtor for notification purposes. This notice is for informational purposes only and does not constitute a demand for payment.

AIG Europe Limited
Insurance Policy No. PTNAM1701557 and PTNAM1802875
January 23, 2019

Should you wish to discuss the foregoing, please do not hesitate to contact us at your earliest convenience. We are available to meet with you to try to reach an amicable resolution.

Your anticipated cooperation in this matter is greatly appreciated.

Cordially,

FERRAIUOLI, LLC

/s/Sonia E. Colón

Sonia E. Colón Colón, Esq.

scolon@ferraiuoli.com

cc: **Ms. Candace M. Arthur**
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